

FILED

MAR 19 2008

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF LANCASTER COUNTY, NEBRASKA

LANC. COUNTY CLERK

COMPREHENSIVE PLAN AMENDMENT NO.)
08001, BY THE DIRECTOR OF PLANNING,)
AT THE REQUEST OF THE DIRECTOR OF)
PUBLIC WORKS & UTILITIES)
DEPARTMENT TO AMEND THE 2030)
LINCOLN-LANCASTER COUNTY)
COMPREHENSIVE PLAN TO ADOPT THE)
PROPOSED WASTEWATER FACILITIES)
MASTER PLAN AS PROVIDED IN)
EXHIBIT "A")

RESOLUTION NO. R-08-0018

WHEREAS, the Director of Planning, at the request of the Director of the Public Works & Utilities Department, wishes to amend the 2030 Lincoln-Lancaster County Comprehensive Plan to adopt the proposed Wastewater Facilities Master Plan; and

WHEREAS, the Lincoln-Lancaster County Planning Department recommends approval of said Comprehensive Plan Amendment concluding that the proposed Wastewater Facilities Master Plan is in conformance with the 2030 Lincoln-Lancaster County Comprehensive Plan; and

WHEREAS, on February 27, 2008, the Lincoln-Lancaster Planning Commission held a public hearing regarding said amendment; and

WHEREAS, on February 27, 2008, the Lincoln-Lancaster County Planning Commission agreed with the staff recommendation and voted to recommend approval of Comprehensive Plan Amendment No. 08001, with two (2) amendments found on Page 5 and the clarifying amendment made by staff on 2/27/08 found on page 12 of Exhibit "A", attached hereto and incorporated by this reference; and

WHEREAS, on March 25, 2008, the Board of Commissioners of Lancaster County conducted a public hearing regarding said amendment; and

WHEREAS, on March 25, 2008, the Board of Commissioners of Lancaster County voted to approve said amendment, including the clarifying amendment, as per the staff recommendation.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of Lancaster County, Nebraska that the 2030 Lincoln-Lancaster County Comprehensive Plan be amended as provided in Exhibit "A", attached hereto and incorporated by this reference. Said amendment shall include the clarifying amendment made by staff on 2/27/08.

BE IT FURTHER RESOLVED, that any other references in said plan which may be affected by the above specified amendments be, and they hereby are, amended to conform to such specific amendment.

DATED this _____ day of _____, 2008, at the County-City Building,
Lincoln, Nebraska.

APPROVED AS TO FORM
this _____ day of _____, 2008.

Deputy County Attorney
for GARY E. LACEY
County Attorney

BY THE BOARD OF COUNTY
COMMISSIONERS OF LANCASTER
COUNTY, NEBRASKA

COUNTY BOARD FACTSHEET

TO : County Clerk
ATTENTION : Susan Starcher
FROM : Marvin S. Krout, Director of Planning *MS Krout*
RE : **Comprehensive Plan Amendment No. 08001**
(Wastewater Facilities Master Plan)
DATE : March 6, 2008

1. Attached is the Planning staff report (p.2-5), the minutes of the Planning Commission (p.6-9) and all other additional information submitted on **Comprehensive Plan Amendment No. 08001**, requested by the Director of the Public Works & Utilities Department to amend the 2030 Lincoln-Lancaster County Comprehensive Plan to adopt the proposed **Wastewater Facilities Master Plan**. This plan provides the City of Lincoln with a guide for short-term and long-term improvements to the infrastructure of the Lincoln wastewater collection and treatment facilities required over the next 20 years and into the longer term. The Facilities Master Plan was developed in conjunction with the Tiers map in the 2030 Comprehensive Plan. The information contained in this plan is to be used for general planning, identifying capital improvement projects and determining funding requirements.
2. The Master Plan document has previously been provided to the County Commissioners on CD and is also available at www.lincoln.ne.gov (keyword = *wastewater master plan*). The amendment proposed by staff on February 27, 2008, set forth below, will be incorporated into the Master Plan document upon approval by the City Council and County Board.
3. The staff recommendation to approve this Comprehensive Plan Amendment is based upon the "Analysis" as set forth on p.2-4, concluding that the proposed Wastewater Facilities Master Plan is in conformance with the 2030 Lincoln-Lancaster County Comprehensive Plan. Overall, the Master Plan identifies approximately \$374 million in improvement costs in order to serve Tier I development by the year 2030. In the near term, the City has programmed sanitary sewer rate increases in each of the next several years in order to maintain the funding necessary to build the improvements. In addition, rate increases will provide funding for needed operation and maintenance costs. The staff presentation is found on p.6-7. The following amendment was proposed by staff at the public hearing before the Planning Commission:

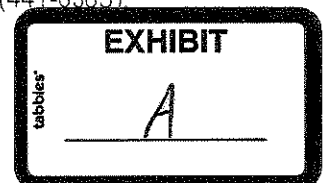
For the purposes of planning, a cost of \$416,000.00 from Alternative 4 was included in the Tier III Theresa Street WWTF improvement. Alternative 4, "Increased Storage" is the preferred alternative and is the basis for all improvements and calculations of the Wastewater Master Plan. The costs for this alternative are spread over a 20 year period starting in the year 2055.

The additional information submitted by staff is found on p.11-14.

4. Testimony in opposition is found on p.7-8, and the record consists of letters in opposition from the Friends of Wilderness Park and attorney Lynn Moorer (p.15-26). The main issue of the opposition is that the Plan does not include a cost-benefit analysis.
5. On February 27, 2008, the Planning Commission agreed with the staff recommendation and voted 7-0 to recommend approval, as amended by staff on 2/27/08 (Larson and Moline absent). See Minutes, p.8-9.
6. The public hearing before the City Council is scheduled for Monday, March 17, 2008, at 1:30 p.m.

Please take the necessary steps to schedule this item on the County Board agenda for public hearing on Tuesday, March 25, 2008, at 9:30 a.m. A briefing on this proposal was held at the County Board staff meeting on February 14, 2008. If you need any further information, please let me know (441-6365).

cc: County Board
County Attorney
County Engineer
Kerry Eagan, County Commissioners
Greg MacLean, Public Works & Utilities
Steve Masters, Public Works & Utilities
Gary Brandt, Public Works & Utilities



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LINCOLN /LANCASTER COUNTY PLANNING STAFF REPORT
for February 27, 2008 Planning Commission Meeting

P.A.S.: Comprehensive Plan Amendment #08001

PROPOSAL: Amend the 2030 Lincoln/ Lancaster County Comprehensive Plan to adopt the Wastewater Facilities Master Plan.

CONCLUSION: The proposed Wastewater Facilities Master Plan is in conformance with the 2030 Lincoln-Lancaster County Comprehensive Plan

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|-------------------------------|------------------------------------|
| <u>RECOMMENDATION:</u> | Approval of the proposed amendment |
|-------------------------------|------------------------------------|

GENERAL INFORMATION:

HISTORY: The previous Wastewater Master Plan was adopted as Comprehensive Plan Amendment #03003 in 2003 as part of the 2025 Comprehensive Plan and was retained with the adoption of the 2030 Comprehensive Plan in November 2006.

COMPREHENSIVE PLAN SPECIFICATIONS: The 2030 Comprehensive Plan states:

Page 75 ***Wastewater Guiding Principles:***
Utility improvements shall be in accordance with the Lincoln Wastewater Facilities Plan and the Comprehensive Plan. The Lincoln Wastewater Facilities Plan will guide future actions and serve as the basis for facilities planning and improvements.

Page 78 *The Public Works and Utilities Department has completed the Lincoln Wastewater Facilities Plan. The plan is a guide for short term and long term improvements to the infrastructure of the Lincoln Wastewater System during the planning period, as well as potential service extensions beyond Lincoln's anticipated future service limits.*

ANALYSIS:

1. Since the adoption of the Lincoln-Lancaster County 2030 Comprehensive Plan in November 2006, the City's Public Works and Utilities Department have worked on the updated Lincoln Wastewater Facilities Master Plan. This plan provides the City of Lincoln with a guide for short-term and long-term improvements to the infrastructure of the Lincoln wastewater collection and treatment facilities required over the next 20 years and into the longer term. The Facilities Plan was developed in conjunction with the tiers map from the 2030 Comprehensive Plan. The information contained in this plan is to be used for general planning, identifying capital improvement projects, and determining funding requirements.

6. One item of particular interest was the Master Plan's analysis of four alternatives for handling collection of wastewater in the southwest area of Lincoln for Tier III development (potentially 50+ years from now). The Master Plan in Chapter 24, starting on page 24-6 examines the following four long term options:
 - a Southwest treatment plant
 - new pipeline along the west side of Salt Creek
 - new pipeline on east side, near two existing sewer lines, adjacent to Wilderness Park, and
 - a new option, adding more peak storage
7. The Wastewater Master Plan recommends additional peak storage as the preferred alternative. The analysis found that peak storage was the least costly and was probably the least difficult to construct and permit. Staff also noted that adding storage would have the least potential for any impact on Wilderness Park of the four alternatives. As stated in a February 7th letter to the Planning Commission. "The storage facility would hold peak flows to be later released into the trunk sewer lines. Wastewater conveyed through the trunk sewers from Southwest Lincoln will be treated at the Theresa Street Wastewater Treatment Facility."
8. Staff noted that there is significant benefit in not disturbing park land and developed land. "Both alternatives involving new trunk line construction would involve significant costs and time involved to design, obtain right-of-way and build pipeline projects. Given the recommended alternative, and the fact that the need for this alternative is potentially 50 years away, it is felt that the additional detailed study is not necessary. The storage alternative manages peak flows with the least adverse impact of the four options effecting both the natural and built environment."
9. Developing the storage facilities to serve future growth will require the city to purchase land for the facilities in the near term. This will secure the land in advance of future development and so that adjoining land uses will know of the potential sanitary sewage storage facility prior to their development.

SUMMARY:

The basic elements of the Lincoln Wastewater System are identified on page 78 and on Appendix pages A39 and A39 of the 2030 Comprehensive Plan. These sections describe the existing wastewater collection and treatment system and outlines future improvements that were projected to meet future needs of community growth. It is important to note, however, that while the description of the future wastewater system is limited to this section, the system's impact on the Plan extends well beyond these pages. The present and future location and scope of the wastewater system is an integral part of the growth plan and its implementation.

Overall, the Master Plan identifies approximately \$374 million in improvement costs in order to serve Tier I development by the year 2030. In the near term, the City

COMPREHENSIVE PLAN AMENDMENT NO. 08001

PUBLIC HEARING BEFORE PLANNING COMMISSION:

February 27, 2008

Members present: Gaylor-Baird, Carroll, Cornelius, Esseks, Francis, Sunderman and Taylor; Larson and Moline absent.

Staff recommendation: Approval

Ex Parte Communications: None

Staff presentation: **Steve Henrichsen of Planning staff** stated that Planning generally reviews these applications for conformance with the Comprehensive Plan. These master plans provide a lot of technical information. This is a big picture of over 200 square miles of future growth area. This looks at Tier I, Tier II and Tier III Growth Areas. This takes into account a lot of the environmental and economical factors. Later this year, we anticipate to have the Water Master Plan in front of Planning Commission. This updates the current reference to the new Wastewater Master Plan as an approved component of the Watershed Master Plan. There was a specific question for an alternative southwest treatment plant. It notes that out of four different alternatives, the preferred alternative was increasing the storage capacity, not for the treatment plant. The proposed language states that alternative storage is the preferred alternative.

Staff offers the clarifying amendment for page 1-20 of the Executive Summary, page 24-17 "Wastewater Treatment Facilities Future Improvements" and other appropriate locations:

~~For the purposes of planning, a cost of \$416,000.00 from Alternative 4 was included in the Tier III Theresa Street WWTF improvement. Alternative 4, "Increased Storage" is the preferred alternative and is the basis for all improvements and calculations of the Wastewater Master Plan. The costs for this alternative are spread over a 20 year period starting in the year 2055.~~

Proponents

1. Steve Masters of Public Works stated that the Lincoln Wastewater System serves the Lincoln community. They need to be mindful of environmental quality. They make use of the tiered growth areas. Detailed information is provided about pipe capacity in the plan. Corolla Engineers began work on the facilities study in 2006. There is a change in the modeling technology that was used. This was a concept that was not used in 2003. It also includes an alternative peak flow storage. As the pipes fill during extreme rain events, off truck storage water could be held until flows recede. This is a concept that has not been included in previous facilities plans. Continued flow monitoring, continued inflow and infiltration reduction are all utilized. The facilities study places emphasis on maintenance.

variable is quite the range. He thinks it can be scaled in a little bit so the alternatives are better defined.

2. **Lynn Moor**er, 404 S. 27th Street, urged Planning Commission not to recommend adoption of the Wastewater Facilities Master Plan update. She submitted a letter in opposition.

Esseks asked Moorer if she could direct him to the City Council minutes referencing cost benefit analysis. He can't find a reference to cost benefit analysis. He would like someone to point it out for him. Moorer noted that Svoboda and Newman both mentioned it.

Staff response and questions:

Esseks believes that a full cost benefit analysis should have been done if it was so stated by the City Council. Henrichsen replied that there were differing opinions in the discussion by City Council. The approved Resolution from City Council talks about a study. The \$500,000.00 was removed to acquire a site and it was changed to a study. Public Works has done an alternative analysis. It is part of a Wastewater Master Plan. A lot of considerations went into the plan. The conclusion was to use storage. He doesn't see what would be gained by spending additional time and funds to probably come to the same conclusion.

Masters commented that they met with Friends of Wilderness Park some time back and talked about many of these same points. He reviewed what was in the plan including their concern about the way Lincoln grows and plans its future. He emphasized that they did not contract with Corolla to do a cost benefit analysis. They asked for their judgement as a company that does nationwide business on water and wastewater engineering. A comment was made that the accuracy of cost estimates was 50 percent/30 percent and that this is not acceptable. He can point to a variety of projects following the range of those costs. An example is the anaerobic digesters on Theresa Street. Public Works was reluctant to accept the bid that they did because the actual cost was 60 percent higher than the estimate. He believes that the costs they use are inline and reasonable.

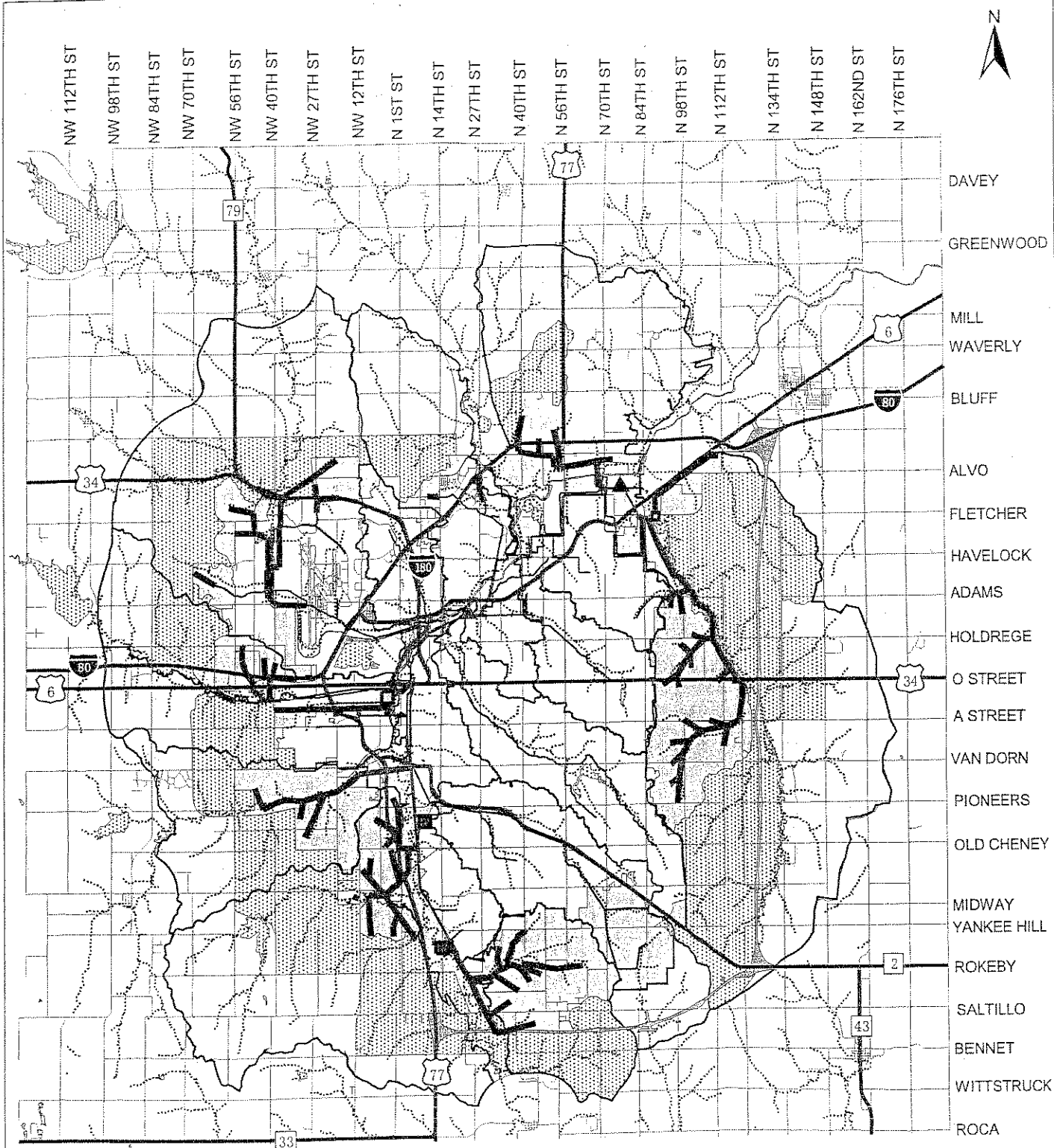
Henrichsen addressed the amendment to eliminate appendix N. The first appendix A is from 1958. A southwest treatment plan is not recommended. It does note a site by the Nebraska State Penitentiary that would be good for a storage facility. There is a lot of useful information. He sees the appendices as background references.

ACTION BY PLANNING COMMISSION:

February 27, 2008

Cornelius moved approval as revised by staff, seconded by Sunderman.

Cornelius stated that he has heard testimony that a cost benefit analysis might or might not be useful. As he understands the report's usefulness, it talks about four different



LEGEND

- ▲ Northeast WWTF
- ▲ Theresa Street WWTF
- Lift Station
- Storage
- Existing Sewers
- Tier I Sewers
- Growth Tiers
 - Existing Service Area
 - Tier I
 - Tier II
 - Tier III

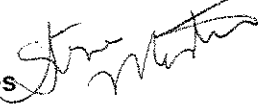
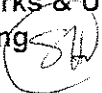
0 1 2 3 Miles



Figure 1.4 Planning Area Tier I Improvements
Wastewater Facilities Master Plan Update - 2007
City of Lincoln, Nebraska

MEMORANDUM

TO: Planning Commission

FROM: Steve Masters, Public Works & Utilities 
Steve Henrichsen, Planning 

SUBJECT: Clarification Amendment to Wastewater Facilities Master Plan

DATE: February 27, 2008

COPIES: Greg MacLean, Director of Public Works & Utilities
Marvin Krout, Planning Director
Trish Owen, Mayor's Office

The draft Wastewater Facilities Master Plan includes an analysis of four alternatives for the collection and treatment of wastewater from Tier I, II and III growth areas in southwest and south Lincoln. The analysis for Tier III development is included in Chapter 24, "Wastewater Treatment Facilities Future Improvements" and is summarized in the Executive Summary. The plan concludes that Alternative 4, Increased Storage, is the preferred alternative. This option was preferred over the other alternatives of building a new trunk line or building a new southwest treatment plant.

All subsequent maps, tables, charts and cost calculations are based on this alternative. Staff also has noted in all presentations that Alternative 4 was the preferred alternative selected for the Master Plan. However, it has been pointed out that the text in the Master Plan could be interpreted by some as not strong enough in stating the preferred alternative.

Thus, staff offers the following clarifying amendment to the Planning Commission for page 1-20 of the Executive Summary, page 24 -17 "Wastewater Treatment Facilities Future Improvements" and other appropriate locations:

"For the purposes of planning, a cost of \$416,000,000 from Alternative 4 was included in the Tier III Theresa Street WWTF improvements. Alternative 4, "Increased Storage" is the preferred alternative and is the basis for all improvements and calculations of the Wastewater Master Plan. The costs for this alternative are spread over a 20 year period starting in the year 2055.

Department of Physics and Astronomy
Nebraska Center for Materials and Nanoscience
255 Behlen Laboratory (10th and R Streets)
(Mail to: 116 Brace Lab., P.O. Box 880111)
Lincoln, NE 68588-0111
tel: 402-472-9838 FAX: 402-472-2879
e mail: pdowben@unl.edu

<http://physics.unl.edu/directory/dowben/dowben.shtml>

4. Summary of Tier III Improvements, Chapter 24, Section 24.2.6: During the January 29, 2008 Public Open House and the January 30, 2008 staff briefing to the Planning Commission, City staff clearly stated that Alternative 4, Increased Storage, was the recommended alternative. By contrast, the actual wording in the WWFMP states that the figures from Alternative 4 were used "for the purpose of planning" and there is no written recommendation. If the WWFMP does, in fact, support the statements made by City staff, a clear recommendation of Alternative 4 should be explicitly stated in the WWFMP matching the public statements made by City staff.

5. Appendix N, Southwest Wastewater Siting Study Report (SWWWSSR): The City Council directed that the comprehensive study of sewage management options be conducted free of any bias. However, the SWWWSSR contains statements that recommend constructing a new sewage plant. These statements directly contradict statements and recommendations contained in the WWFMP.

The SWWWSSR is premised on the notion that a new sewage plant and associated facilities should be constructed in southwest Lincoln. The SWWWSSR recommends a specific site in southwest Lincoln and urges that steps be taken now to secure that site. By contrast, the WWFMP states that the four alternatives identified for Tier III (which include a new southwest treatment plant as one of the alternatives) represent "equal" solutions" and claims that the costs for all four alternatives are "nearly equal". As noted above, the WWFMP does not explicitly state that one of the four alternatives is recommended above the others. Nor does it explicitly state that any of the alternatives should be ruled out.

Thus, besides failing to make an explicit and specific recommendation regarding Tier III improvements, the WWFMP does not determine explicitly whether or not a third sewage treatment plant is needed, despite the City Council's directive. Moreover, inclusion of the SWWWSSR in the WWFMP injects a bias which the City Council explicitly prohibited.

These failures in the WWFMP taint its usefulness and confuse. They will become even more confusing and potentially contentious in the years to come if the long-range recommendations of the WWFMP are attempted. Presented as an Appendix to the WWFMP, the SWWWSSR is anointed with a degree of implied acceptance and concurrence that it clearly does not warrant. The SWWWSSR should be removed as an Appendix to the WWFMP. If it is used at all, it should be as a stand-alone document, not as a part of the WWFMP.

The Friends of Wilderness Park recommend that these issues be thoroughly addressed and adequately resolved before the Planning Commission forwards the draft WWFMP to the City Council for consideration.

Sincerely,

Mary Roseberry-Brown
President, Friends of Wilderness Park
1423 F Street
Lincoln, NE 68508

Attachment (1)

cc: Lincoln City Council
Mayor Beutler

016

1. Provide efficient wastewater collection and treatment service for existing as well as future users in the City of Lincoln.
2. Provide for continued protection of public health and the environment.
3. Comply with relevant local, State, and Federal operating permits, regulations, and other requirements.
4. Continue growth and development policies of providing gravity sanitary sewer service in drainage basins (Carollo 2007, pp. 1-1 and 2-3).

The WFMP reflects those concerns, not cost-benefit analysis. Additionally, there is no indication that the list of related “studies, reports, memorandums, improvement plans, and other documents” that Carollo “used, referenced and incorporated” into the WFMP included cost-benefit analysis (Carollo 2007, pp. 2-3 through 2-5). Furthermore, a review of summary statements in the WFMP finds nothing about cost-benefit analysis.

Lack of Cost-Benefit Summary in the WFMP

The summary of a cost-benefit analysis is to present the key assumptions and results of the basic evaluation.

That summary should include information on the net present value of benefits and costs and the stream of benefits and costs for all cases that the analysis examines in detail. It should also highlight key factors that have been quantified as well as those that have not. Finally, the summary should identify incremental net benefits from selecting different alternatives (Arrow, et al., p. 10).

No such summary exists in the WFMP, nor was any attention given to calculating a stream of benefits and costs, incremental net benefits, and/or the use of cost-benefit analysis to compare alternatives.

The WFMP states at the beginning of chapter 7 that economic evaluation is important (p. 7-1) and states in the summary of chapter 7 that a summary of recommendations from the evaluation is at the end of chapters 10 through 24 (p. 7-2). Yet, that is not the case. They contain neither the results of economic evaluation nor a summary of such evaluation. The summaries include pipe capacity and flows (p. 11-11), planning costs (pp. 10-29, 11-10 through

each item is meritorious. That was not completed. In the same report, the WFMP states that “on its negative side” the East site “does have floodplain and wetland issues that will need to be addressed through site development activities” (p. 1). Such a statement is premature. It is not possible to conclude that the floodplain and wetland issues should be addressed through site development activities until such activities for the floodplain and wetland meet the criteria of cost-benefit analysis. Such analysis of the floodplain and wetland is not included in the WFMP.

The “Southwest Wastewater Facility Siting Study Report” also states that there may be “environmental issues” associated with the East site and that the site “should be investigated through geotechnical and environmental testing and evaluation” (p. 1). The results of geotechnical and environmental testing should have been designed to provide a database needed by cost-benefit evaluation. It was not. Without a testing design consistent with the needs of economic analysis, the testing will not provide relevant information for public decision makers. In the final summary paragraph, the WFMP claims that the East site appears to be the most “economical site” (p. 2). That statement is without foundation because an economic analysis was not completed.

Net Present Value and the Discount Rate

Central to cost-benefit analysis is net present value. The idea of the net present value concept is that the value of a benefit or cost today is different than a benefit or cost of the same value tomorrow.

The standard criterion for deciding whether a government program can be justified on economic principles is *net present value* - - the discounted monetized value of expected net benefits (i.e., benefits minus costs): Net present value is computed by assigning monetary values to benefits and costs, discounting future benefits and costs using an appropriate discount rate, and subtracting the sum total of discounted costs from the sum total of discounted benefits. Discounting benefits and costs transforms gains and issues occurring in different time periods to a common unit of measurement (U.S. OMB 2000, p. 3).

measures the value of what society must forgo to use the input to implement the policy” (Boardman, et al., 1996, p. 31).

In addition to the cost of land for the site, cost calculations should include operational, maintenance, damage and restoration, replacement, and disposal costs. These costs are not included in the WFMP.

“Both intangible and tangible benefits and costs should be recognized. The relevant cost concept is broader than private-sector production and compliance costs or government cash expenditures” (U.S. OMB 2000, p. 5). An imputed purchase price for an asset such as a land site that is already owned by the government “or which has been acquired by donation or condemnation should be based on the fair market value of similar properties that have been traded on commercial markets in the same or similar localities” (U.S. OMB 2000, p. 15).

Without calculations of the wide range of societal and imputed costs, cost-benefit analysis is not possible. Nor is it possible to make informed government investment decisions about the project without such information.

Concluding Remark

The path, technical knowledge, and programs for cost-benefit analysis of physical projects and site selection are the most developed of all government investment decision making because cost-benefit analysis developed first in those areas in the 1930s and has continued to develop through widespread application and theoretical extensions. There is a well developed literature base, a plethora of examples, and an extensive infrastructure of technical expertise upon which Carollo could have drawn.

LYNN E. MOORER

ATTORNEY AT LAW

404 South 27th Street, Lincoln, NE 68510
Phone 402.474.2186; Fax 402.474.1911
E-mail lmoorer@windstream.net

27 February 2008

Lincoln City / Lancaster County Planning Commission
555 S. 10th Street
Lincoln, NE 68508

Re: Proposed Wastewater Facility Master Plan update

Dear Members of the Board:

I urge you not to recommend adoption of the proposed Wastewater Facilities Master Plan update.

In 2006, the City Council received information indicating that many municipalities are moving toward centralized or regional sewage management systems. These cities are finding it safer and more cost efficient to centralize their sewage systems.

In response, the City Council appropriated \$500,000 in August 2006 for a comprehensive, unbiased sewage study, including cost-benefit analysis, to analyze options for the entire city. In seeking to obtain information regarding the costs and benefits of a variety of sewage management options and whether Lincoln should go with one treatment plant or more than one, the City Council commissioned a far more rigorous study than what Public Works has generated for previous Wastewater Master Plans.

When a year later, in August 2007, Public Works had still not completed this study and instead asked for money that worked at cross purposes to its mandate, the City Council reaffirmed its 2006 directive and declined to appropriate the requested new money.

The Public Works Director recently stated that the proposed Master Plan update "tak[es] care of" the City Council's directive for a comprehensive, unbiased sewage study. Unfortunately, the proposed update does not actually do what the City Council said it should do. Moreover, the proposed update is technically deficient in many respects.

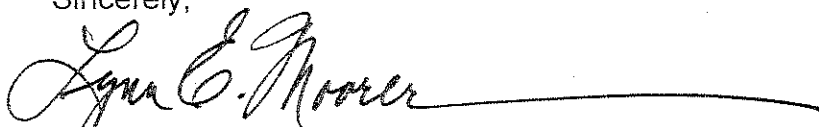
A central problem is that cost-benefit analysis is completely missing. That's according to Dr. Gregory Hayden, a professor of economics at UN-L and an expert in

Moreover, Public Works needs to produce a study that fully meets the City Council's mandate. Lincoln cannot manage its sewage issues, which are becoming more and more complex, or plan adequately without competent cost-benefit analysis and examination of forward-looking technologies like other cities are doing. Without this, Lincoln and its citizens will soon find themselves at a significant disadvantage and, possibly, at risk from a public health, safety, or environmental perspective.

I wish I could support adoption of this update, but it's not possible. It does not contain the information and analysis that the City Council directed and the taxpayers and residents of Lincoln need.

Thank you for your careful consideration of this matter.

Sincerely,

A handwritten signature in cursive script, reading "Lynn E. Moorer", followed by a long horizontal line extending to the right.

Lynn E. Moorer

Attachment (1)